



INEOS Chemicals Pension Plan Implementation Report

May 2024

Background and Implementation Statement

Background

The regulatory landscape continues to evolve as ESG becomes increasingly important to regulators and society. The Department for Work and Pensions ('DWP') has increased the focus around ESG policies and stewardship activities by issuing further regulatory guidance relating to voting and engagement policies and activities. These regulatory changes recognise the importance of managing ESG factors as part of a Trustee's fiduciary duty.

Implementation Report

This Implementation Report is to provide evidence that the Plan continues to follow and act on the principles outlined in the SIP.

The SIP can be found online at the web address: [Statement of Investment Principles \(ineos.com\)](https://www.ineos.com/statement-of-investment-principles)

Changes to the SIP are detailed on the following pages.

The Implementation Report details:

- Actions the Trustee has taken to manage financially material risks and implement the key policies in its SIP;
- The current policy and approach with regards to ESG and the actions taken with managers on managing ESG risks;
- The extent to which the Trustee has followed policies on engagement, covering engagement actions with its fund managers and in turn the engagement activity of the fund managers with the companies in which they invest; and
- Voting behaviour covering the reporting year up to 31 December 2023 for and on behalf of the Plan including the most significant votes cast by the Plan or on its behalf.

Summary of key actions undertaken over the Plan reporting year

During the reporting period, the Trustee agreed to revise the strategic benchmark and to rebalance the portfolio in order to improve liquidity. The key actions undertaken include:

- The LDI portfolio was rebalanced in order to achieve a c.90% interest rate and inflation hedge ratio on the Technical Provisions basis
- The Plan carried out an in-specie transfer of assets from the monthly dealt M&G Alpha Opportunities Fund to the daily dealt M&G Total Return Credit Fund
- The Plan fully redeemed the active equity allocation with Baillie Gifford and Veritas with the proceeds being invested into the LGIM Absolute Return Bond fund in order to increase the LDI collateral

The changes to the Plan's investment strategy are reflected in the latest SIP.

Implementation Statement

This report demonstrates that the INEOS Chemicals Pension Plan has adhered to its investment principles and its policies for managing financially material considerations including ESG factors and climate change.

Signed by the Trustee of the INEOS Chemicals Pension Plan

May 2024

Managing risks and policy actions

Risk / Policy	Definition	Policy	Actions taken in the year ending December 2023
Interest rates and inflation	The risk of mismatch between the value of the Plan assets and present value of liabilities from changes in interest rates and inflation expectations.	The Plan invests within a Liability Driven Investment mandate, this mandate aims to hedge these risks.	In Q1 2023, the Trustee received updated liability cashflow data following the results of the 31 December 2020 Actuarial Valuation. The Plan's level of hedging was subsequently updated to be based on the new liability cashflow data.
Liquidity	Difficulties in raising sufficient cash when required without adversely impacting the fair market value of the investment.	To maintain a sufficient allocation to liquid assets so that there is a prudent buffer to pay members' benefits as they fall due (including transfer values), and to provide collateral to the LDI manager.	The investment strategy distributes regular income to assist in paying benefits as they fall due. Following the events of the 'mini-budget' in September 2022 and the increased strain placed on liquidity due to capital calls from the LDI mandate, the Trustee reviewed the Plan's investment strategy in Q1 2023 in order to improve liquidity.
Market	Experiencing losses due to factors that affect the overall performance of the financial markets.	To remain appropriately diversified and hedge away any unrewarded risks, where practicable.	The Plan reduces market risk by diversifying its assets across a range of asset classes and investment managers. These allocations are monitored on a quarterly basis relative to the Strategic Asset Allocation (set out in the SIP) in the Investment Performance Report.
Credit	Default on payments due as part of a financial security contract.	To diversify this risk by investing in a range of credit markets across different geographies and sectors. To appoint investment managers who actively manage this risk by seeking to invest only in debt securities where the yield available sufficiently	The Plan reduces credit risk by diversifying its assets across a range of different credit issuers which provide exposures to a range of sectors and geographies. These positions are monitored on a quarterly basis relative to the Strategic Asset Allocation in the

		compensates the Plan for the risk of default.	Investment Performance Report.
Environmental, Social and Governance	Exposure to Environmental, Social and Governance factors, including but not limited to climate change, which can impact the performance of the Plan's investments.	To acknowledge Environmental, Social and Governance factors when appointing new mandates and when monitoring existing mandates. The Trustee monitors the managers on an ongoing basis.	The ESG policy was reviewed by the Trustee as part of the SIP update in July 2023. The Trustee undertook a Sustainability Integration Assessment exercise in May 2024 of each of the underlying investment managers as part of their ESG policy.
Currency	The potential for adverse currency movements to have an impact on the Plan's investments.	To invest in GBP share classes where it is deemed appropriate to eliminate unwanted direct currency risk. To largely invest with managers that hedge exposure to foreign currency risk in underlying holdings, except where active currency positions are held.	No Trustee actions or amendments were implemented over the reporting period in respect of currency risk.
Non-financial	Any factor that is not expected to have a financial impact on the Scheme's investments.	Non-financial matters are not taken into account in the selection, retention or realisation of investments.	No Trustee actions or amendments were implemented over the reporting period in respect of non-financial risks.

Changes to the SIP

During the Plan year, the SIP was updated to reflect changes to the investment strategy and regulatory requirements relating to engagement and the exercise of voting rights.

Policies added to the SIP

Date updated: July 2023

Voting Policy - How the Trustees expect investment managers to vote on their behalf	<ul style="list-style-type: none">The Trustee has acknowledged responsibility for the voting policies that are implemented by the Plan's investment managers on their behalf.
Engagement Policy - How the Trustees will engage with investment managers, direct assets and others about 'relevant matters'	<ul style="list-style-type: none">The Trustee has acknowledged responsibility for the engagement policies that are implemented by the Plan's investment managers on their behalf.The Trustee, via their investment advisers, will engage with managers about 'relevant matters' at least annually.
Investment Strategy	<ul style="list-style-type: none">The SIP was updated to reflect the changes to the investment strategy.

Current ESG policy and approach

ESG as a financially material risk

The SIP describes the Trustee’s policy with regards to ESG as a financially material risk. The below table outlines the areas which the Plan’s investment managers are assessed on when evaluating their ESG policies and engagements. The Trustee intends to review the ESG policies and engagements periodically to ensure they remain fit for purpose.

The next page details our view of the managers, our actions for engagement and an evaluation of the engagement activity.

Risk Management	<ol style="list-style-type: none"> 1. Integrating ESG factors, including climate change risk, represents an opportunity to increase the effectiveness of the overall risk management of the Scheme 2. ESG factors can be financially material and managing these risks forms part of the fiduciary duty of the Trustee
Approach / Framework	<ol style="list-style-type: none"> 3. The Trustee should understand how asset managers make ESG decisions and will seek to understand how ESG is integrated by each asset manager. 4. ESG factors are relevant to investment decisions in all asset classes. 5. Managers investing in companies’ debt, as well as equity, have a responsibility to engage with management on ESG factors.
Reporting & Monitoring	<ol style="list-style-type: none"> 6. Ongoing monitoring and reporting of how asset managers manage ESG factors is important. 7. ESG factors are dynamic and continually evolving; therefore the Trustee will receive training as required to develop their knowledge. 8. The role of the Scheme’s asset managers is prevalent in integrating ESG factors; the Trustee will, alongside the investment advisor, monitor ESG in relation to the asset managers’ investment decisions.
Voting & Engagement	<ol style="list-style-type: none"> 9. The Trustee will seek to understand each asset managers’ approach to voting and engagement when reviewing the asset managers’ approach. 10. Engaging is more effective in seeking to initiate change than disinvesting.
Collaboration	<ol style="list-style-type: none"> 11. Asset managers should sign up and comply with common codes and practices such as the UNPRI & Stewardship code. If they do not sign up, they should have a valid reason why. 12. Asset managers should engage with other stakeholders and market participants to encourage best practice on various issues such as board structure, remuneration, sustainability, risk management and debtholder rights.

ESG summary and actions with the investment managers

The Plan completed a Sustainability Integration Assessment for the year ending 31 December 2023. The actions with investment managers are below:

Manager and Fund	ESG Summary	Actions identified	Engagement details
LGIM World Equity Fund and LGIM Cash Fund	<p>We consider LGIM to be market leaders in incorporating ESG and climate factors into their investment fund range. LGIM has a dedicated and well-resourced team focused on key ESG issues. However, there is limited scope to adapt the investment approach to ESG in the passive equity range.</p> <p>Despite the passive nature of the fund range, the fund does actively engage with underlying companies in line with the firmwide Stewardship priorities whilst also taking advantage of LGIM's ESG reporting framework, namely the ESG scoring system.</p>	<p>LGIM should consider setting explicit fund level ESG, climate and social objectives.</p> <p>LGIM should consider making ESG training program compulsory for all members of the team.</p> <p>The fund range should consider reporting on nature or biodiversity-related metrics.</p>	<p>Isio engaged with LGIM on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio reports back to the Trustees with updates on the LGIM engagements.</p>
M&G – Total Return Credit Investment Fund	<p>M&G boasts a robust company-wide ESG strategy, illustrating their competency in managing ESG risks within the Fund. However, the ESG reporting lags vs peers in the market as M&G do not produce detailed ESG metrics</p>	<p>M&G should consider implementing a fund-level ESG policy.</p> <p>M&G should look to formalise stewardship priorities at the fund level and increase proportion of underlying portfolio assets that are engaged with.</p>	<p>Isio engaged with M&G on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio will report back to the Trustee with updates on the M&G engagements.</p>

	and tracking for the assets contained within the portfolio.	M&G should continue to improve data coverage and reporting metrics.	
		M&G should disclose the ESG ratings for assets held in the Fund in quarterly reporting.	
M&G Secured Property Income Fund	<p>M&G have an established Responsible Property Investment framework, which governs ESG integration into the Fund. Extensive ESG analysis of underlying assets is carried out as part of their standard due diligence process.</p> <p>M&G are also focusing on developing a net zero carbon pathway model to monitor assets' climate emissions within the Fund.</p> <p>There is, however, limited engagement at an underlying asset level and a lack of an engagement policy given the underlying assets are buildings.</p>	<p>M&G should introduce sector related exclusions for controversial behaviour.</p> <p>M&G should consider reviewing the ESG scorecard annually.</p> <p>M&G should consider engagements at a fund level and improve social initiatives with tenants.</p> <p>M&G should include social and nature or biodiversity-related metrics.</p>	<p>Isio engaged with M&G on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio reports back to the Trustee with updates on the M&G engagements.</p>
LGIM Liability Driven Investment	<p>LGIM is actively committed to integrating ESG considerations into LDI funds. Their dedicated ESG team plays a crucial role in stewardship and responsible investment, ensuring premium risk management through their proprietary tools.</p> <p>At a firm level LGIM is strong in their approach to ESG and Stewardship.</p>	<p>LGIM should introduce a formal ESG training program with defined training priorities.</p> <p>LGIM should provide better incentives, more choice and encouragement to investors for using Active ESG tool to maximise engagement, improving outcomes.</p> <p>LGIM should Increase GHG data coverage for holdings within the fund.</p>	<p>Isio engaged with LGIM on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio reports back to the Trustees with updates on the LGIM engagements.</p>

<p>Permira Private Market Credit Solutions III Fund</p>	<p>Given these fund vintages are fully deployed, the scope for fund-level improvements is limited. Future improvements are therefore likely to focus on enhancing engagement and reporting capabilities.</p> <p>Permira has a dedicated ESG team which supports engagement actions and aids training across the credit business. Permira have sought to improve data collection through primary data collection to feed into reporting quality, however these areas have been downgraded from last year due to the standards improving across newer vintages within the direct lending space.</p>	<p>Permira should look to enhance the level of engagements and provide evidence of the impact of these.</p> <p>Permira should improve fund-level reporting and the gathering of data on fund ESG characteristics.</p> <p>Permira should look to set a firmwide commitment to Net Zero</p>	<p>Isio engaged with Permira on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio reports back to the Trustee with updates on the Permira engagements.</p>
<p>JP Morgan Infrastructure Investments Fund</p>	<p>JPM have demonstrated that the Fund has clear ESG policies and priorities in place, and that ESG is integrated through all stages of the investment process.</p> <p>The level of ESG integration is strong and reporting is line with its peers in the market.</p>	<p>JP Morgan should include measurable climate and social objectives.</p> <p>JP Morgan should utilise independent ESG data sources and introduce nature/biodiversity risks within their ESG scorecard.</p> <p>JP Morgan should introduce ongoing quarterly ESG metrics reporting.</p> <p>JP Morgan should expand on collaborative initiatives and white papers supporting ESG outcomes.</p> <p>JP Morgan should put in place a firm level target for carbon emission and temperature increases.</p>	<p>Isio engaged with JP Morgan on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio reports back to the Trustees with updates on the JP Morgan engagements.</p>
<p>LGIM Absolute Return Bond</p>	<p>LGIM is one of the more advanced asset managers in relation to ESG, with a well-defined firm-wide</p>	<p>LGIM should develop a process for independently assessing the effectiveness of green/sustainability-linked/use-of-proceeds bonds.</p>	<p>Isio engaged with LGIM on the Trustee's behalf to review their ESG policies and set actions and priorities. Isio reports back to the Trustees</p>

	<p>ESG policy and a net zero commitment. LGIM provides ESG scores for all assets within the portfolio and can provide the required TCFD Scope 1 and 2 metrics. LGIM also encourages investee companies to align sustainability reporting with best-practice frameworks. LGIM collaborates with a range of industry participants to monitor and influence a broad range of ESG topics.</p>	<p>LGIM should work on reporting nature or bio-diversity related metrics in line with TNFD.</p>	<p>with updates on the LGIM engagements.</p>
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Engagement

As the Plan invests via fund managers, the managers provided details on their engagement actions including a summary of the engagements by category for the 12 month period to 31 December 2023.

Fund name	Engagement summary	Commentary
LGIM World Equity Fund	<p>Total Engagements: 1,203</p> <p>Environmental: 530</p> <p>Social: 181</p> <p>Governance: 389</p> <p>Other: 103</p>	<p>LGIM's Investment Stewardship team are responsible for engagement activities across all funds. LGIM share their finalised ESG scorecards with portfolio companies and the metrics on which they are based.</p> <p>LGIM currently do not provide details of their engagement activities at Fund level, however the firm is considering how such information can be provided going forward. Isio will work with LGIM on the development of the firm's engagement reporting.</p> <p>Details of LGIM's engagement policies can be found on their website: Investment stewardship & governance LGIM Institutional</p>
LGIM Cash Fund	<p>Total Engagements: 13</p> <p>Environmental: 9</p> <p>Social: 0</p> <p>Governance: 4</p>	<p>LGIM's Investment Stewardship team are responsible for engagement activities across all funds. LGIM share their finalised ESG scorecards with portfolio companies and the metrics on which they are based.</p> <p>LGIM currently do not provide details of their engagement activities at Fund level, however the firm is considering how such information can be provided going forward. Isio will work with LGIM on the development of the firm's engagement reporting.</p>

<p>M&G Total Return Credit Investment</p>	<p>Total Engagements: 8 Environmental: 5 Social: 1 Governance: 2</p>	<p>M&G adopt a systematic approach to engagement in which predetermined objectives are established beforehand and evaluated based on the results of engagements. M&G monitor the success of an engagement by assessing whether they have met their objectives and log this into a wider system.</p> <p>M&G analysts are expected to show a more detailed understanding of key ESG risks that impact the issues in which they oversee. If engagements are considered necessary, analysts engage with issues supported by M&G's Sustainability and Stewardship Team enabling them to utilise their understanding and consider sustainable themes effectively using their developed expertise.</p> <p>Examples of a significant engagement include:</p> <p>AIA GROUP LTD (AIA) - M&G engaged to encourage insurance company AIA to increase board diversity. Since initial discussions in September 2021, AIA has added two female directors to its board. Most recently, in September 2023, AIA announced the appointment of a new Independent Non-executive Director and a member of the Nomination Committee of the Company. The new addition means AIA now has three female directors on its board (23% female representation).</p> <p>ING GROEP NV (ING) – M&G engaged with ING in relation to their climate targets and strategy (the company is currently committed to a near term SBTi). M&G had a number of requests to better allow them to measure and track progress, as well as encouraging a net zero commitment, beyond its near term commitment. One such request included a continuation of CDP disclosure, which the company had stopped completing. As a result of M&G's engagement, ING successfully completed CDP disclosure in 2023.</p>
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M&G Secured Property Income Fund	Total Engagements: 21	<p>The Secured Property Income Fund is a real estate fund, thus M&G own buildings rather than investments within companies. As such, they engage in a different way to shareholders/bondholders (i.e. they do not attend AGMs/Company meetings/have voting rights).</p> <p>Due to the nature of most of the leases within the Fund, M&G state that their overall influence as a landlord is limited. They maintain dialogue with all occupiers, and as part of this, ESG-related behaviours are encouraged. The fund is committed to becoming net-zero on carbon emissions by 2050 and are currently developing initiatives to help meet this goal. M&G engage with tenants, typically quarterly, on ESG initiatives such as net zero targets and energy efficiency of the underlying assets.</p> <p>Examples of a significant engagement include:</p> <p>WPP – M&G engaged with WPP in relation to the build phase of 1 Southwark Bridge. In conjunction with WPP, M&G engineered the build phase to minimise embedded carbon. A pre-assessment indicated a target BREEAM New Construction rating of ‘Excellent’. However, SPIF has agreed to fund the additional costs to achieve a BREEAM New Construction ‘Outstanding’ rating.</p> <p>David Lloyd – M&G are supporting David Lloyd in rolling out solar PV across its entire portfolio to meet its ambitious 2030 net zero carbon target. M&G hold regular meetings with David Lloyd’s ESG director to discuss progress. David Lloyd is funding the initiative given the energy cost saving benefit for them.</p>
LGIM Liability Driven Investment	LGIM was unable to provide engagement statistics for the LDI funds held.	<p>LGIM leverage the wider capabilities of the global firm to engage with companies. The team also regularly engage with regulators, governments, and other industry participants to address long-term structural issues, aiming to stay ahead of regulatory changes and adopt best practice.</p> <p>Details of LGIM’s engagement policies can be found on their website: Investment stewardship & governance LGIM Institutional</p>
Permira Private Market Credit Solutions III Fund	Total Engagements: 13	<p>Permira maintain ongoing contact with the management teams of their portfolio companies, however, given their position as lenders they will typically rely on the equity sponsor to report ESG-related concerns and drive ESG improvements. Investing in private companies also reduces the transparency of the information available to assess ESG risks.</p> <p>Permira's approach to engagement for Direct Lending is focused on a) Collective Engagement, via annual data collection and sharing insights in ESG report and webinars, b) Deeper, one-on-one engagement with portfolio companies, focused on specific ESG topics, and c) Industry engagement with peers and Industry bodies.</p> <p>An example of significant engagement includes:</p> <p>Autovista – Permira initiated engagement with Autovista in 2022 to improve their ESG approach and integrate ESG margin ratchets in loan documentation. Across Permira’s Direct Lending fund range, seven ESG margin ratchets were</p>

		<p>implemented with portfolio companies by 2023, furthering Permira's commitment to better ESG risk management. Autovista demonstrated a commitment to improving ESG measures through engaging with EcoVadis, a leading ESG-rating provider. Enhanced loan terms were provided to Autovista through an ESG margin ratchet, yielding positive results in EcoVadis ESG ratings. Permira continues to work with EcoVadis and portfolio companies to expand the application of ESG-related margin ratchets.</p>
<p>J.P. Morgan Asset Management Infrastructure Investments Fund</p>	<p>JP Morgan do not currently provide strategy level numbers for annual engagement.</p>	<p>J.P. Morgan Asset Management is actively engaged with the underlying portfolio companies and management teams with regards to ESG matters. Each portfolio company customises a comprehensive ESG framework crafted by the Fund's team with specific goals and objectives, training sessions, monitoring procedures, and practical implementation of best practices. The Fund endeavours to align management teams with ESG objectives through compensation structures.</p> <p>In addition, ESG is a Board agenda item and updates are given at each board meeting, including benchmarking results. Further, each year the Fund's portfolio companies participate in the GRESB assessment which benchmarks each company's ESG practices against industry standards and provides insights into areas of strength and areas of improvement.</p> <p>Examples of significant engagement include:</p> <p>El Paso Electric (EPE) – IIF engaged with EPE to navigate transition risks tied to a low/no-carbon energy future. This engagement aligns with the UN Sustainable Development Goal of Climate Action. Through 100% ownership, IIF worked with management to set specific carbon reduction goals and put in place an action plan. As a result, EPE has set and published significant carbon reduction targets: 80% carbon-free energy by 2035 and complete decarbonisation of their generation portfolio by 2045.</p> <p>Sonnedix – IIF works with Sonnedix to continuously monitor human rights issues, its supply chain and meeting the requirements of its Modern Slavery policy to prevent and eradicate forced labour. Sonnedix expects the same zero-tolerance approach from those who undertake work on its behalf and these expectations are set out in the Sonnedix Responsible Supply Chain Design and Procurement Standard. As JPM IIF has 100% ownership of the Company, it continuously engages with the board to ensure the correct governance of human right policies.</p>

<p>LGIM Absolute Return Bond Fund</p>	<p>Total Engagements: 278</p>	<p>LGIM have a strong and integrated ESG approach for pooled funds which follows a robust framework.</p>
	<p>Environmental: 124</p>	<p>At a firm level, LGIM regularly monitor companies and where engagements are unsuccessful, the team will assess where problems arose and new approaches to be employed. LGIM engage with regulators, governments, and other industry participants to address long-term structural issues.</p> <p>LGIM currently do not provide details of their engagement activities at Fund level, however the firm is considering how such information can be provided going forward. Isio will work with LGIM on the development of the firm's engagement reporting.</p>
	<p>Social: 34</p>	
	<p>Governance: 84</p>	
	<p>Other: 36</p>	

Voting (for equity funds only)

The Trustee has acknowledged responsibility for the voting policies that are implemented by the Plan's investment managers on their behalf.

Only LGIM as the Plan's equity fund manager has voting rights and they have provided details on their voting actions, including a summary of the activity, covering the reporting year up to 31 December 2023. The Trustee has adopted the managers definition of significant votes and has not set stewardship priorities. The manager has provided examples of votes they deem to be significant, and the Trustee has shown the votes relating to the greatest exposure within the Plan's investment.

Fund name	Voting summary	Examples of most significant votes	Commentary
LGIM World Equity Fund	<p><i>Meetings eligible to vote: 3,055</i></p> <p><i>Resolutions eligible to vote: 37,810</i></p> <p><i>Resolutions voted for: 99.91%</i></p> <p><i>Resolutions voted with management: 78.94%</i></p> <p><i>Resolutions voted against management: 20.93%</i></p> <p><i>Resolutions abstained from: 0.13%</i></p>	<p>Microsoft Corporation –</p> <p>Date of vote: 7 December 2023</p> <p>Summary of the resolution: Resolution 1.06 - Elect Director Satya Nadella</p> <p>On which criteria have they assessed this vote to be 'most significant': Thematic - Board Leadership: LGIM considers this vote to be significant as it is in application of an escalation of their vote policy on the topic of the combination of the board chair and CEO</p> <p>Approximate size of the fund's/mandate's holding at the date of the vote: 4.2%</p> <p>How did they vote: Against</p> <p>Rationale of voting decision: Joint Chair/CEO: A vote against is applied as LGIM expects companies to separate the roles of Chair and CEO due to risk management and oversight concerns</p> <p>Outcome of the vote: N/A</p>	<p>LGIM's Investment Stewardship team are responsible for managing voting activities across all funds. All decisions are made in accordance with relevant Corporate Governance & Responsible Investment and Conflicts of Interest policy documents which are reviewed annually.</p>

Where they voted against management, did they communicate their intent to the company ahead of the vote:

LGIM publicly communicates its vote instructions on its website with the rationale for all votes against management. It is our policy not to engage with our investee companies in the three weeks prior to an AGM as our engagement is not limited to shareholder meeting topics

Amazon.com Inc. –

Date of vote: 24 May 2023

Summary of the resolution:

Resolution 13 – Report on Median and Adjusted Gender/Racial Pay Gaps

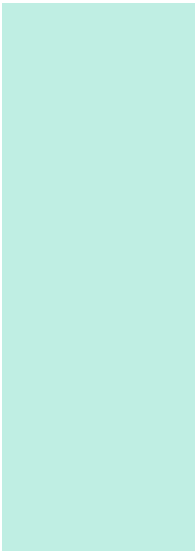
On which criteria have they assessed this vote to be 'most significant':

Pre-declaration and Thematic – Diversity: LGIM views gender diversity as a financially material issue for their clients, with implications for the assets they manage on their behalf.

Approximate size of the fund's/mandate's holding at the date of the vote: 1.5%

How did they vote: For (Against Management Recommendation)

Rationale of voting decision: A vote in favour is applied as LGIM expects companies to disclose meaningful information on its gender pay gap and the initiatives it is applying to close any stated gap. This is an important disclosure so that investors can assess the progress of the company's diversity and inclusion initiatives. Board diversity is an engagement and voting issue, as we believe cognitive diversity in business – the bringing together of people of different ages, experiences, genders, ethnicities, sexual orientations, and social and



economic backgrounds – is a crucial step towards building a better company, economy and society.

Outcome of the vote: Fail

Where they voted against management, did they communicate their intent to the company ahead of the vote: LGIM pre-declared its vote intention for this meeting on the LGIM Blog. As part of this process, a communication was sent to the company ahead of the meeting.
